

## Wilful Penalty Calculation

Taxpayer Name: Catherine Reyes

	Statutory 31 USC 5321(a)(5)(C) & (D)	Mitigated Penalties IRM 4.26.16.6.6					Actual Penalty Proposed			
		Level 1	Level 2	Level 3	Level 4	Total				
		Adjusted Maximum Account Balance on Due Date subject to penalty	Adjusted Closing Account Balance on Due Date subject to penalty	The greater of A) \$1,000/year or B) 5% of the MAB during the year/violation	For each acct: the greater of A) 10% of \$5,000 or B) 10% of the maximum balance in the account during the year	For each acct: 50% of the balance as of the last day for filling the FBAR (6/30/xx)	For each Level 4 acct: the greater of A) \$100,000 or B) 50% of the balance in the account as of the last day for filling the FBAR (6/30/xx)			
2010 Statute:	Maximum Account Balance during the year ending 12/31/200X 12/31/2010	Closing Balance on FBAR Filing Due Date (6/30/200X) 6/30/2011	Owner ship Percen tage	Lloyds TSB Bank 2,161,500 \$ 2,161,500	1,080,750 \$ 1,080,750	1,096,907 \$ 1,096,907	1,056,907 \$ 1,056,907	528,453 \$ 528,453	172,022 \$ 172,022	
2011 Statute:	12/31/2011	6/30/2012		Lloyds TSB Bank 2,113,813 \$ 2,113,813	50%	1,056,907 \$ 1,056,907	1,032,129 \$ 1,032,129	1,032,129 \$ 1,032,129	516,065 \$ 516,065	172,022 \$ 172,022
2012 Statute:	12/31/2012	6/30/2013		Lloyds TSB Bank 2,113,485 \$ 2,113,485	50%	1,056,743 \$ 1,056,743	1,050,665 \$ 1,050,665	1,050,665 \$ 1,050,665	525,333 \$ 525,333	172,021 \$ 172,021
<b>Total Penalties for All Years</b>						<b>\$ 3,139,701</b>		<b>\$ 1,569,850</b>	<b>\$ 516,065</b>	

## ANALYSIS &amp; CONCLUSION:

[Using 50% of 6/30/2012 balance to spread evenly over 2010 - 2012.

Exhibit

CC